

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE NEURONTIN MARKETING AND SALES PRACTICES LITIGATION)	MDL DOCKET NO. 1629 CIVIL ACTION NO. 04-10981
THIS DOCUMENT RELATES TO: ALL ACTIONS)	MOTION FOR PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT, CERTIFICATION OF SETTLEMENT CLASS, AND OTHER <u>RELIEF</u>

Pursuant to Federal Rule of Civil Procedure 23, Class Plaintiffs respectfully move for entry of an order: (1) granting preliminary approval of the proposed class action settlement; (2) certifying the Class and Subclass (both defined in accompanying documents) for settlement purposes; (3) appointing Class Representatives and Subclass Representative for the Class and Subclass; (4) appointing Class Counsel and counsel for the Subclass; (5) appointing a Claims Administrator; (6) approving the proposed notice plan and form of notice; (7) scheduling a hearing for final approval of the settlement; and (8) temporarily barring Class Members, directly or representatively, from commencing or prosecuting any action or proceeding in any court or tribunal asserting any of the Released Claims (as defined in the Settlement) against the Released Parties (also defined in the Settlement) pending final determination of whether the Settlement should be approved.

The grounds for this motion are set forth in the accompanying Memorandum of Law and exhibits thereto, the accompanying Declaration of Daniel Coggeshall In Support of Proposed Settlement Notice Program, Form of Notice and Appointment of Notice Administrator and exhibits thereto, and any other written or oral submission the Court may require. A proposed order is attached hereto.

Dated: May 30, 2014

Respectfully Submitted,

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*Members of the Class Plaintiffs'
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system has been served pursuant to Case Management Order #3 on May 30, 2014.

/s/ Thomas Sobol
Thomas Sobol